

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SPRING HILL,

Plaintiff,

vs.

Hon, Judith E. Levy

Case: 24-cv-11500

PROVIDENT ASSET MANAGEMENT, LLC,
a Michigan Limited Liability Company,

Defendant.

Francyne Stacey (P33225)
STACEY LAW PRACTICE, PLLC
455 E. Eisenhower Pkwy, Suite 300
Ann Arbor, MI 48108
(7734) 821-8088
francyne@staceylawpractice.com

**PLAINTIFF’S MOTION, AFFIDAVIT, AND
VERIFICATION FOR ATTORNEY FEES AND
COSTS**

Plaintiff, Spring Hill, by and through her counsel, Stacey Law Practice, PLLC, respectfully moves for an award of attorney fees and costs pursuant to F.R.C.P 54 (d) and the Fair Housing Amendments Act of 1988 (“FHAA), 42 U.S.C. 3601 et seq.

LOCAL RULE CERTIFICATION: I, Francyne Stacey, certify that this document complies with Local Rule 5.1(a), including double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. (Local Rule 7.1(d)(3).)

Respectfully submitted,

Date: 02/04/2025

STACEY LAW PRACTICE

/s/Francyne Stacey (P33225)

Attorney for Plaintiff

455 E Eisenhower Pkwy, Suite 300

Ann Arbor, MI 48108

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**BRIEF IN SUPPORT OF PLAINTIFF’S MOTION, AFFIDAVIT, AND
VERIFICATION FOR ATTORNEY FEES AND COSTS**

I. Authority of Court to Award Fees

Plaintiff relies on Fed.R.Civ. P. 54(d) which states in relevant part:

(d) COSTS; ATTORNEY'S FEES.

(1) *Costs Other Than Attorney's Fees.* Unless a federal statute, these rules, or a court order provides otherwise, costs—other than attorney's fees—should be allowed to the prevailing party.

(2) *Attorney's Fees.*

(A) *Claim to Be by Motion.* A claim for attorney's fees and related nontaxable expenses must be made by motion.

Plaintiff also relies on the Fair Housing Amendments Act of 1988 (“FHAA”), 42 U.S.C. §3613(c)(2) which allows the court to award attorney fees and costs to the prevailing party.

II. Attorney fees and Costs

A. Identity and Qualifications

1. I am an attorney duly licensed to practice law in the State of Michigan and admitted to practice before the United States District Court for the Eastern District of Michigan.

2. I am counsel of record for Plaintiff in the above-captioned matter.

B. Basis for Attorney Fee Request

3. I submit this request in support of Plaintiff’s Request for Attorney fees and costs in compliance with Federal Rule of Civil Procedure 54(d).

4. The fees requested are reasonable and necessary for the litigation in this case.

5. The fees requested are my customary fees and generally in line with the prevailing rate in the community and my years of practice (Exhibit 1 - State Bar of Michigan 2023 Economics of Law Practice Report)

III. Breakdown of Attorney Fees

6. Below is a summary of the legal work performed including my hourly rate and the number of hours expended:

Date	Task Description	Hours	Hourly Rate	Total Amount
03/14/2024	Review info from Fair Housing Center, call Jim Fink (defense counsel)	.50	\$410.00	\$205.00
04/05/2024	Tc with J Fink and client re status	.17	\$410.00	\$69.70
04/09/2024	Tc with client re moving, review emails to and from management company, text to client re next steps	.50	\$410.00	\$205.00
04/15/2024	Leave message for J Fink re going forward and filing complaint	.17	\$410.00	\$69.70
04/26/2024	Tc with client re moving out, update to Jim Fink, settlement demand to J. Fink	1.0	\$410.00	\$410.00
05/22/2024	Draft complaint, send to client to review	3.84	\$410.00	\$1574.40
06/08/2024	Complete and file complaint	1.0	\$410.00	\$410.00

06/08/2024	Filing fee federal court	costs	\$405.00	\$405.00
07/23/2024	Emails to J. Fink with copy of complaint and summons	.34	\$410.00	\$139.40
07/29/2024	Attention to service, attention to and respond to emails from J. Dantzler, emails to client and P Kisch re same	1.0	\$410.00	\$410.00
08/01/2024	Various emails re service, default judgment and miscellaneous status issues, file service documents, send to J. Dantzler	.84	\$410.00	\$344.40
09/01/2024	Prepare motion for entry of default judgment	.84	\$410.00	\$344.40
09/06/2024	File entry of default	1.00	\$410.00	\$410.00
09/06/2024	Draft and file motion and brief for entry of default	2.00	\$410.00	\$820.00
09/23/2024	Sheriff service fees	costs	\$32.00	\$32.00
10/22/2024	File for default judgment	2.0	\$410.00	No charge
11/25/2024	File motion for entry of default	.84	\$410.00	\$344.40
01/28/2025	Tc with Spring Hill to prepare for court testimony, review file	2.84	\$410.00	\$1,164.40

	documents			
01/30/2025	Prepare for court hearing, review complaint and other documents and court appearance on motion for default	2.84	\$410.00	\$1,164.40

Exhibit 2 contains the invoices for this matter and includes attorney fees and costs.

Exhibit 3 is the court docket sheet showing payment of the \$405.00 filing fee.

Exhibit 4 shows the sheriff's fee for service.

Exhibit 5 is a parking receipt for the date of the court hearing.

I certify and affirm that the time entries and expenses reflected herein are accurate and were incurred in the course of representing Plaintiff in this matter.

IV. Conclusion

Based on the above, I respectfully request this Court to award attorney fees in the amount of \$8,085.20 and costs in the amount of \$441.50.

Respectfully submitted,

Date: 02/05/2025

STACEY LAW PRACTICE

/s/Francyne Stacey (P33225)
Attorney for Plaintiff